

**REMARKS**

For the remarks made herein, applicant respectfully requests reconsideration and withdrawal of the rejections.

Claims 1-12 are pending and stand rejected.

Claims 1-12 stand rejected under 35 USC 102(b) as being anticipated by Yonemitsu (USP No. 5,485,279).

Applicant thanks the examiner for providing further reasoning for rejecting the claims on page 2 of the Final Office Action. However, applicant respectfully disagrees with, and explicitly traverses, the reason for rejecting the claims.

Claim 1 recites

1. A video encoder for encoding images in a first resolution mode with reference to a reference image having said first resolution, the encoder comprising:

a memory having the capacity for storing said reference image with said first resolution; and

control means:

for selectively encoding said images in a second, lower resolution mode with reference to two reference images having said second resolution, and

for storing said two reference images with the second resolution in said memory.

Yonemitsu teaches an encoding system for producing a low resolution signal from a higher resolution signal. Yonemitsu teaches a full-resolution encoding unit 101 for encoding an HDTV signal into well-known 8x8 blocks and a quarter-resolution image forming unit 103 that selects 4x4 DC coefficients from the upper left-hand corner of the 8x8 coefficients of each block, i.e., lower-resolution. This operation is shown in Figures 14, 16, 18 and 20; Figure 20 is referred to by the examiner in the instant Office Action.

Figure 14 illustrates an encoding circuit wherein a one-quarter resolution image is formed from a current high-resolution image that is reduced in resolution (117) and a prior high-resolution image (111,112) that was reduced in resolution. The prior high-

resolution image is stored in a full-resolution image memory and the lower resolution image is stored in the lower-resolution image memory. In this aspect of the invention, the lower-resolution image is formed from two high-resolution images that are both resolution reduced; only one of which is stored in the low-resolution image memory.

Figure 16 illustrates an encoding circuit wherein a lower resolution image, i.e.,  $\frac{1}{4}$  resolution, is produced as a reduced resolution image of a high-resolution image and a lower resolution image, which was stored in a low resolution memory 121. (see col. 20, lines, 2-8, which state, “[d]ata C9 constitutes mismatching error data representing the difference between 4X4 predicted image data . . . included in a predetermined portion of the predicted image data produced from a high-resolution data stored in a full-resolution frame memory and 4X4 predicted image data groups produced by processing quarter-resolution data stored in a quarter-resolution frame memory.) Hence, in this aspect, a lower resolution image is produced from a reduced resolution full-resolution image and a stored lower resolution image. Only one stored lower resolution image is used in the determination of the lower resolution image.

Figures 18 and 20 also illustrate aspects wherein a high-resolution image stored in a full-resolution memory is resolution-reduced (component 112) and combined with a lower resolution image stored in a reduced resolution memory to produce a lower resolution image. Again only one stored lower resolution image is used in the determination of the lower resolution image

Thus, Yonemitsu generally teaches producing a lower resolution image from the combination of a high resolution image that is dynamically reduced and a single prior stored lower resolution image.

A claim is anticipated only if each and every element recited therein is expressly or inherently described in a single prior art reference. Yonemitsu cannot be said to anticipate the present invention because Yonemitsu fails to disclose each and every element recited.

More specifically, Yonemitsu fails to disclose "encoding said images in a second, lower resolution mode with **reference to two reference images** having said second resolution, and for **storing said two reference images with the second resolution in said memory**," as is recited in the claims. Rather, Yonemitsu discloses storing a lower

resolution in memory and then producing a lower resolution image using the stored lower resolution image and a reduced resolution high-resolution image. Yonemitsu fails to disclose determining a lower resolution image from two reference images that were stored in the memory.

Having shown that Yonemitsu fails to disclose each and every element claimed, applicant submits that the reason for the rejection of the claim has been overcome and can no longer be sustained. Applicant respectfully requests withdrawal of the rejection and allowance of the claim.

For the above reason, applicant respectfully requests withdrawal of the rejection and allowance of the claims.

With regard to independent claims 6, 11 and 12, these claims were rejected reciting the same references used in rejecting claim 1. Thus, the remarks made in response to the rejection of claim 1 are also applicable in response to the rejection of claims 6, 11 and 12,, as these claims recite subject matter similar to that recited in claim 1. Accordingly, in view of the remarks made with regard to the rejection of claim 1, which are reasserted, as if in full, in response to the rejection of claims 6, 11 and 12, applicant submits that the reason for rejecting these claims can no longer be sustained. Applicant respectfully requests withdrawal of the rejection and allowance of the claims.

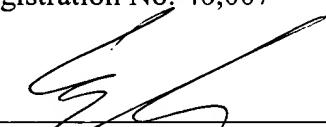
With regard to the remaining claims, these claims depend from the independent claims, which have been shown to be allowable in view of the cited references. Accordingly, these claims are also allowable by virtue of their dependence from an allowable base claim.

Although the last Office Action was made final, this amendment should be entered. No matter has been added to the claims that would require comparison with the prior art or any further review.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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 5/16/05  
(Signature and Date)